

September 16, 2005

Federal Deposit Insurance Corporation San Francisco, Regional Office Director Johns F. Carter 25 Jessie Street at Ecker Square Suite 2300 San Francisco, California 94105

Dear Director Carter:

On behalf of myself, my bank, and my directors and also representing the 125 member banks of the Community Bankers Association of Alabama, I strongly, urge you to reject the application by Wal-Mart Stores, Inc. to charter an industrial Loan Company bank in Utah. The barrier between Banking and Commerce has played an integral part in the safety and soundness of the banking system and in maintaining a healthy U.S. economy. This barrier has been reinforced by Congress representing the American people.

In this fast moving age we are living in, with the ups and downs of our economy, it is important that Community Bankers stay closely attuned to current and emerging risk issues. Statistics show the typical community bank needs to spend 3 to 5 cents more than its large-bank counter part to generate one dollar of operating revenue. That difference is material.

Allowing a commercial or financial firm to operate a full-service nationwide FDIC insured bank, outside the framework established by Congress for the other owners of insured banks raises significant safety and soundness concerns, creates an unlevel competitive playing field and poses important questions to the Congress concerning the Nations policy of maintaining the separation of Banking and Commerce.

Because of Industrial banks more-open ownership policy, Wal-Mart Stores Inc, the so-called category killer because it tends to crush competition, has tried to get into the banking business by buying an ILC. The future of the community banking industry could be at stake. The systemic risk posed by a Wal-Mart bank would be enormous. With a branch of Wal-Mart Bank in every store, small bankers plead with Congress to spare them the fate of momand pop hardware and variety stores, which were strangled by Wal-Mart.

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Are you going to allow Wal-Mart the opportunity to price community banks out of the markets, eliminating the engine for economic growth in the community, causing the eventual demise of community banks, communities, the dual banking systems, putting in peril the F.D.I.C. insurance fund, creating another monstrous "Too Big to Fail" bank with no real control over the parent company? I don't think you should go there. There are a lot of good reasons for not allowing one giant entity to control a major part of the payment system.

As the industry becomes more concentrated, do these institutions have the kind of risk management – do they have the business contingency plan? If it should roll off significantly, can it bring itself back on track and can we in a timely way influence that bank? With size and complexity goes a challenge both for the managers of the company and the regulators.

Giant banks have enormous public policy implications. The trillion dollar bank that eventually could result from this charter will be Too big to fail and will pose a systemic risk to the F.D.I.C. Insurance Fund. Evidence shows that increased concentration in the banking industry has not benefited bank customers and has not had a positive effect on the convenience and needs of the communities served by the acquired banks.

An example of unbridled economic concentration, it would represent a dangerous and unprecedented concentration of economic power.

Thank you for the opportunity to comment. Hopefully you will prayerfully consider this application and follow the path of maintaining a strong barrier between banking and commerce, keeping a strong community banking complex to serve Main Street Americas financial needs.

Sincerely

Stanley Patterson

Executive Vice President



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Sincerely,

Judy Berry

Sr. Vice President



P.O. Box 250 Guntersville, AL 35976

256-505-4600

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Casey Griep

Assistant Vice President



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Rick Malone

Rick Malone Vice President



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Carrie R. Gellespie

Carrie Gillespie Assistant Vice President



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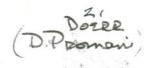
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Sincerely, Blues Horbison

Beverly Harbison

Assistant Vice President





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Sincerely,

Brenda Brown

Brenda Brown Assistant Vice President



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Michael W. Alred

CEO



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Susan Varano

Assistant Vice President



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Are you going to allow Wal-Mart the opportunity to price community banks out of the markets, eliminating the engine for economic growth in the community, causing the eventual demise of community banks, communities, the dual banking systems, putting in peril the F.D.I.C. insurance fund, creating another monstrous "Too Big to Fail" bank with no real control over the parent company? I don't think you should go there. There are a lot of good reasons for not allowing one giant entity to control a major part of the payment system.

As the industry becomes more concentrated, do these institutions have the kind of risk management – do they have the business contingency plan? If it should roll off significantly, can it bring itself back on track and can we in a timely way influence that bank? With size and complexity goes a challenge both for the managers of the company and the regulators.

Giant banks have enormous public policy implications. The trillion dollar bank that eventually could result from this charter will be Too big to fail and will pose a systemic risk to the F.D.I.C. Insurance Fund. Evidence shows that increased concentration in the banking industry has not benefited bank customers and has not had a positive effect on the convenience and needs of the communities served by the acquired banks.

An example of unbridled economic concentration, it would represent a dangerous and unprecedented concentration of economic power.

Thank you for the opportunity to comment. Hopefully you will prayerfully consider this application and follow the path of maintaining a strong barrier between banking and commerce, keeping a strong community banking complex to serve the financial needs.

Sincerely,

Patrick Smith

Sr. Vice President



September 16, 2005

Federal Deposit Insurance Corporation San Francisco, Regional Office Director Johns F. Carter 25 Jessie Street at Ecker Square Suite 2300 San Francisco, California 94105

Dear Director Carter:

On behalf of myself, my bank, and my directors and also representing the 125 member banks of the Community Bankers Association of Alabama, I strongly, urge you to reject the application by Wal-Mart Stores, Inc. to charter an industrial Loan Company bank in Utah. The barrier between Banking and Commerce has played an integral part in the safety and soundness of the banking system and in maintaining a healthy U.S. economy. This barrier has been reinforced by Congress representing the American people.

In this fast moving age we are living in, with the ups and downs of our economy, it is important that Community Bankers stay closely attuned to current and emerging risk issues. Statistics show the typical community bank needs to spend 3 to 5 cents more than its large-bank counter part to generate one dollar of operating revenue. That difference is material.

Allowing a commercial or financial firm to operate a full-service nationwide FDIC insured bank, outside the framework established by Congress for the other owners of insured banks raises significant safety and soundness concerns, creates an unlevel competitive playing field and poses important questions to the Congress concerning the Nations policy of maintaining the separation of Banking and Commerce.

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Donna Mefford

Assistant Vice President

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Tonya Bright

Assistant Vice President

Jorya Bught